

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In Re:</b>	§	
	§	
<b>DEEP MARINE HOLDINGS, INC.,</b>	§	<b>Case No. 09-39313</b>
<b>Et al.</b>	§	
	§	
<b>Debtors.</b>	§	<b>Jointly Administered Chapter 11</b>

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<b>DEEP MARINE 1, LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>Adversary No. 10-03271</b>
	§	
<b>THE DEEP MARINE LIQUIDATING TRUST (AS SUCCESSOR TO DEEP MARINE TECHNOLOGY INCORPORATED, DEEP MARINE HOLDINGS, INC., DEEP MARINE 1, LLC, DEEP MARINE 2, LLC, DEEP MARINE 3, LLC, AND DEEP MARINE 4, LLC); ET AL.</b>	§	
	§	
	§	
<b>Defendants.</b>	§	

**AGREED MOTION TO EXTEND THE DISCOVERY DEADLINE**

General Electric Capital Corporation (“GE”) and The Deep Marine Liquidating Trust (“Liquidating Trust”) file this Motion to Extend the Discovery Deadline and, in support thereof, state as follows:

1. On October 18, 2010 this Court entered a Comprehensive Scheduling Order (“Scheduling Order”) setting the discovery deadline for January 14, 2011 in the above matter.

2. On December 14, 2010 the Liquidating Trust and GE attended Court ordered mediation with all parties, held in Adversary No 10-3312, in an attempt to reach a global settlement of all claims, which was unsuccessful. Since mediation, the Liquidating Trust and GE have been exploring the possibility of settling the Liquidating Trust's claims against GE.

3. While settlement negotiations continue, the Liquidating Trust and GE are currently scheduling depositions and have been exchanging available dates. The parties have agreed to extend the discovery deadline until January 31, 2011 in order that all depositions requested by each party may be completed.

4. This adversary proceeding is currently set for trial on April 28, 2011. Thus, extending the discovery deadline until January 31, 2011 will not prejudice either the Liquidating Trust or GE as the parties prepare for trial.

5. The relief requested in this Agreed Motion is not sought for purposes of delay, but in the interest of justice.

**WHEREFORE**, the Liquidating Trust and GE pray that this Court enter an Order GRANTING their Agreed Motion to Extend the Discovery Deadline from January 14, 2011 to January 31, 2011, and for all other relief each party may be entitled to in law and equity.

Respectfully submitted,

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\* Admitted in the State of Louisiana.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served electronically via the Court's ECF notice on the parties listed below on this 7<sup>th</sup> day of January, 2011:

/s/ Susan C. Mathews  
Susan C. Mathews

**SERVICE LIST**

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